

SRF Round 3: CAA File Metric Calculation

State: Jefferson County, AL

Date of On-Site Review: 15/08/2022

Review of FY 2021 Activity

| # | Facility Name | Facility ID | | | | | | | | | | | | |
|----|---|--------------------|----|----|----|----|-----|-----|-----|-----|-----|-----|-----|-----|
| | | | 2b | 6a | 6b | 7a | 8c | 9a | 10a | 10b | 14 | 11a | 12a | 12b |
| 1 | DRUMMOND COMPANY, INC. (ABC COKE) | ALJEF0000107300001 | N | Y | Y | Y | Y | Y | Y | Y | N/A | Y | Y | Y |
| 2 | BIRMINGHAM HIDE AND TALLOW | ALJEF0000107300057 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 3 | IKG/BORDEN (IKG INDUSTRIES) | ALJEF0000107300062 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 4 | SMI STEEL, INC. | ALJEF0000107300080 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 5 | MPLX TERMINALS LLC BIRMINGHAM TERMINAL | ALJEF0000107300213 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 6 | NUCOR STEEL BIRMINGHAM,INC. | ALJEF0000107300260 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 7 | SOUTHERN NATURAL GAS CORP. | ALJEF0000107300267 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 8 | READY MIX USA,LLC | ALJEF0000107300271 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 9 | LEHIGH CEMENT COMPANY | ALJEF0000107300290 | N | Y | Y | Y | N | Y | N/A | N/A | N/A | Y | Y | Y |
| 10 | BLUESTONE COKE | ALJEF0000107300355 | N | Y | Y | Y | N | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 11 | MILLER AND COMPANY LLC | ALJEF0000107300372 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 12 | OAK GROVE RESOURCES, LLC | ALJEF0000107300395 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 13 | REMURITE TECHNOLOGIES L.L.C. | ALJEF0000107300437 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 14 | C & B PIPING, INC.(LEEDS) | ALJEF0000107300455 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 15 | BAMA CONCRETE BIRMINGHAM | ALJEF0000107300465 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 16 | MERIDIAN BRICK, LLC BESSEMER PLANT NO. 6 | ALJEF0000107300486 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 17 | MELSUR CORPORATION | ALJEF0000107300494 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 18 | READY MIX USA TARRANT FACILITY | ALJEF0000107300552 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 19 | BELLSOUTH TELECOMMUNICATIONS, INC.DBA AT&T ALABAM | ALJEF0000107301019 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 20 | UNIVERSITY OF ALABAMA AT BIRMINGHAM | ALJEF0000107301044 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 21 | BAMA CONCRETE BIRMINGHAM, BESSEMER PLANT | ALJEF0000107301048 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 22 | JEFFERSON COUNTY LANDFILL NO. 1 | ALJEF0000107301052 | N | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 23 | BLAIR BLOCK LLC | ALJEF0000107301101 | Y | Y | Y | Y | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| 24 | KINDERMORGAN SOUTHEAST TERMINALS LLC (FY 2020) | ALJEF0000107300235 | N | Y | Y | Y | N | Y | N/A | N/A | N/A | Y | Y | Y |
| 25 | BLUESTONE COKE (FY 2020) | ALJEF0000107300355 | N | Y | Y | Y | Y | N/A | N | N/A | N | N/A | N/A | N/A |
| 26 | UNIVERSITY OF ALABAMA AT BIRMINGHAM (FY 2019) | ALJEF0000107301044 | N | Y | Y | Y | N | Y | N/A | N/A | N/A | Y | Y | Y |
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SRF Round 3: CAA File Metric Calculation

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| Total Yes Responses (Numerator) | 11 | 26 | 26 | 26 | 2 | 4 | 1 | 1 | 0 | 4 | 4 | 4 | Y |
| Total Responses (Denominator) | 26 | 26 | 26 | 26 | 6 | 4 | 2 | 1 | 1 | 4 | 4 | 4 | N |
| Percentage | 42.3% | 100.0% | 100.0% | 100.0% | 33.3% | 100.0% | 50.0% | 100.0% | 0.0% | 100.0% | 100.0% | 100.0% | N/A |

SRF Round 3: CAA File Metric Calculation

READ BEFORE STARTING:

Begin data entry in this tab. Enter based on each facility's File Review Checklist. Enter a Y for Yes and an N for No into the cells for each metric. If a metric does not apply to a particular

SRF Round 3: CAA File Metric Initial Findings

State: Jefferson County, AL

Review of FY 2021 Activity

| CAA Metric # | CAA File Review Metric Description | Numerator | Denominator | Percentage | Goal | Initial Findings | Details |
|-------------------------------|---|-----------|-------------|------------|------|-------------------------------|---------|
| ELEMENT 1: DATA | | | | | | | |
| 2b | Accurate MDR data in AFS | 11 | 26 | 42.3% | 100% | Area for State Improvement | |
| ELEMENT 2: INSPECTIONS | | | | | | | |
| 6a | Documentation of FCE elements | 26 | 26 | 100.0% | 100% | Meets or Exceeds Requirements | |
| 6b | Compliance monitoring reports (CMRs) or facility files reviewed that provide sufficient documentation to determine compliance of the facility | 26 | 26 | 100.0% | 100% | Meets or Exceeds Requirements | |
| ELEMENT 3: VIOLATIONS | | | | | | | |
| 7a | Accurate compliance determinations | 26 | 26 | 100.0% | 100% | Meets or Exceeds Requirements | |
| 8c | Accurate HPV determinations | 2 | 6 | 33.3% | 100% | Area for State Improvement | |
| ELEMENT 4: ENFORCEMENT | | | | | | | |
| 9a | Formal enforcement responses that include required corrective action that will return the facility to compliance in a specified time frame | 4 | 4 | 100.0% | 100% | Meets or Exceeds Requirements | |
| 10a | Timeliness of addressing HPVs or alternatively having a case development and resolution timeline in place. | 1 | 2 | 50.0% | 100% | Area for State Improvement | |
| 10b | Appropriate enforcement responses for HPVs | 1 | 1 | 100.0% | 100% | Meets or Exceeds Requirements | |
| 14 | HPV Case Development and Resolution Timeline (CD&RT) contains required policy elements | 0 | 1 | 0.0% | 100% | Area for State Improvement | |
| ELEMENT 5: PENALTIES | | | | | | | |
| 11a | Penalty calculations reviewed that document gravity and economic benefit | 4 | 4 | 100.0% | 100% | Meets or Exceeds Requirements | |
| 12a | Documentation of rationale for difference between initial penalty calculation and final penalty | 4 | 4 | 100.0% | 100% | Meets or Exceeds Requirements | |

SRF Round 3: CAA File Metric Initial Findings

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Best Practice

Meets Requirements

Area for Attention

SRF Round 3: CAA File Metric Initial Findings

| | | | | | | |
|-----|---------------------|---|---|--------|------|-------------------------------------|
| 12b | Penalties collected | 4 | 4 | 100.0% | 100% | Meets or Exceeds Requirements |
|-----|---------------------|---|---|--------|------|-------------------------------------|

Finding Category Descriptions

Meets or Exceeds Expectations: The SRF was established to define a base level or floor for enforcement program performance. This rating describes a

Area for State Attention: Area for State Attention: An activity, process, or policy that one or more SRF metrics show as a minor problem. Where

Area for State Improvement: EPA will develop a finding of Area for State Improvement whenever an activity, process, or policy that one or more SRF metrics under a specific element show as a significant problem that the agency is required to address. A finding for improvement should be developed

Instructions:

Numerator, Denominator, and Metric Value: Pulls values automatically from Step 1.

Initial Findings: Choose one of three finding categories listed in the drop-down menu.

Details: Provide additional details to substantiate the initial finding.

SRF Round 3: CAA File Metric Initial Findings

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SRF Round 3: CAA Facility-Specific Comments

| State: Jefferson County, AL | | | |
|-----------------------------|-----------------------------------|--------------------|------------------|
| # | Facility Name | Facility ID | General comments |
| 1 | DRUMMOND COMPANY, INC. (ABC COKE) | ALJEF0000107300001 | |

SRF Round 3: CAA Facility-Specific Comments

| Review of FY 2021 Activity | | | | |
|---|-------------|-------------|-------------|-------------|
| 2b comments | 6a comments | 6b comments | 7a comments | 8c comments |
| <p>Stack tests: ICIS indicates that stack tests were conducted on 10/6/2020 (pass); 12/3/2021 (pass); 5/24/2021 (fail); 7/6/2021 (pass, PM); 9/28/2021 (pending, SO2). For the stack tests conducted on 10/6/2020, 12/3/2020, 5/24/2021 the pollutant was not listed, and for the stack test conducted on 9/28/2021 the results are listed as pending.</p> <p>T5 ACC: ICIS indicates that a T5 ACC was received on 1/28/2021 and was reviewed on 1/28/2021. The file contained a T5 ACC dated 12/15/2020 and received by Jefferson County on 12/22/2020. The Jefferson County tracking document indicates that the T5 ACC was received on 12/17/2020 and reviewed on 1/28/2021.</p> <p>Informal enforcement actions: The file contained a copy of an NOV dated 8/20/2021, issued for a failed stack conducted on 5/25/2021. The NOV was not listed in ICIS.</p> <p>Formal enforcement actions: The file contained a release agreement dated 8/23/2021 that assessed the facility a \$42,000 civil penalty. The formal action was not listed in ICIS.</p> <p>Penalty: The file contained a copy of a civil penalty in the amount of \$42,000. The civil penalty amount was not listed in ICIS.</p> | | | | |

SRF Round 3: CAA Facility-Specific Comments

| 9a comments | 10a comments | 10b comments | 14 comments | 11a comments | 12a comments | 12b comments |
|-------------|--------------|--------------|-------------|--------------|--------------|--------------|
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SRF Round 3: CAA Facility-Specific Comments

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| 2 | BIRMINGHAM HIDE AND TALLOW | ALJEF0000107300057 | |
| 3 | IKG/BORDEN (IKG INDUSTRIES) | ALJEF0000107300062 | |
| 4 | SMI STEEL, INC. | ALJEF0000107300080 | |
| 5 | MPLX TERMINALS LLC BIRMINGHAM TERMINAL | ALJEF0000107300213 | |
| 6 | NUCOR STEEL BIRMINGHAM, INC. | ALJEF0000107300260 | |
| 7 | SOUTHERN NATURAL GAS CORP. | ALJEF0000107300267 | |
| 8 | READY MIX USA, LLC | ALJEF0000107300271 | |

SRF Round 3: CAA Facility-Specific Comments

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| <p>Facility identification – Data in ICIS compared to reports and street number not included in the address.</p> <p>Air Programs & CMS Source – ICIS indicates that the facility is subject to NSPS Dc. The permit and the inspection report indicate that the facility is subject to MACT JJJJJJ and NSPS Dc. ICIS does not include that the facility is subject to MACT JJJJJJ.</p> | | | | |
| <p>FCE: ICIS indicates that two FCEs were completed on 5/5/2021. The file contained a copy of an inspection report for an FCE conducted on 5/5/2021. The Jefferson County tracking document indicates that one FCE was completed on 5/5/2021. The FCE was entered into ICIS twice and one should be deleted.</p> | | | | |
| <p>Air Programs – Review of Title V permit shows facility is subject to Part 63, Subpart YYYYYY (EAF Area source rule). ICIS does not indicate applicability to any Part 63 rule.</p> | | | | |
| <p>Air Programs – Review of Title V permit shows facility is subject to Part 63, Subpart BBBBBB (Bulk terminal area source rule). ICIS does not indicate applicability to any Part 63 rule.</p> | | | | |
| <p>T5 ACC – The T5 ACC reviewed on 10/8/2020 was entered into ICIS twice.</p> <p>Air Programs – The facility is subject to Part 63, Subpart ZZZZ. There is no information regarding MACT applicability listed in ICIS.</p> | | | | |

SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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| 9 | LEHIGH CEMENT COMPANY | ALJEF0000107300290 | |
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SRF Round 3: CAA Facility-Specific Comments

Stack test: ICIS indicates that two stack tests were conducted. One test was conducted on 9/13/2021 (pass, PM), and the other test was conducted on 9/21/2021 (failed, PM). The file contained a copy of a report for testing that was conducted on 9/13-16/2021, and a copy of a report for testing that was conducted on 9/21-23/2021. The file contained a copy of a report for the retest that was conducted on 11/30/2021 – 12/1/2021. ICIS indicates that at a test was conducted on 11/30/2021 but the results indicate pending. The retest results were not updated in ICIS.

T5 ACC: The file contained a copy of T5 ACC dated 11/12/2020 and received by Jefferson County on 11/24/2020. The Jefferson County tracking document indicates that the T5 ACC was received on 11/24/2020 and reviewed on 12/1/2020. The November 2020 T5 ACC information was not entered into ICIS.

FRV: ICIS indicates that no violation (FRV or HPV) was identified in fourth quarter of 2021 or the first and second quarter of 2022. The file contained a copy of an NOV dated 11/10/2021 for the failed stack test that was conducted on 9/21/2021. The FRV was not entered into ICIS.

Informal enforcement actions: The file contained a copy of an NOV dated 11/10/2021 for the failed stack test that was conducted on 9/21/2021. The NOV was not entered into ICIS.

Jefferson County issued an NOV dated 11/10/2021 for failing a stack test on 9/21/2021. The NOV was not listed in ICIS and not identified as an FRV.

SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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| 10 | BLUESTONE COKE | ALJEF0000107300355 | |
| 11 | MILLER AND COMPANY LLC | ALJEF0000107300372 | |
| 12 | OAK GROVE RESOURCES, LLC | ALJEF0000107300395 | |

SRF Round 3: CAA Facility-Specific Comments

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|--|--|--|--|---|
| <p>T5 ACC: ICIS indicates that a T5 ACC was received on 1/27/2021 and reviewed on 1/27/2021. The file contained a copy of the T5 ACC dated 1/28/2021. The Jefferson County tracking document indicates that the T5 ACC was received on 12/19/2020 and reviewed on 1/14/2021. The T5 ACC received date and the review date listed in ICIS do not match the dates in the file.</p> <p>Informal enforcement action: The file contained a copy of an NOV that was issued on 9/16/2021. The NOV is not listed in ICIS.</p> <p>Air programs: This was identified under file #25, and not included here as well.</p> | | | | <p>Jefferson County issued an NOV dated 9/16/2021 for failing to install and properly maintain baffles in quench tower identified during the 9/8/2021 onsite PCE. The NOV was not listed in ICIS.</p> |
| <p>Facility Identifiers: ICIS indicates that the facility is names Oak Grove Resources. The permit in the file indicates that the facility name is Crimson Oak Grove Resources.</p> <p>T5 ACC: ICIS indicates that the T5 ACC was received on 5/5/2021 and reviewed on 5/5/2021. The file contained a copy of the TT ACC that was received by Jefferson County on 4/12/2021, the Jefferson Count tracking document indicates that the T5 ACC was received on 4/12/2021 and reviewed on 5/5/2021. The date the T5 ACC was received that is listed in ICIS is different than the date found in the file.</p> <p>Air programs and subparts: The permit indicates that the facility is subject to the requirements of MACT subpart CCCCCC. ICIS does not list that the facility is subject to MACT subpart CCCCCC.</p> | | | | |

SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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| 13 | REMURATE TECHNOLOGIES L.L.C. | ALJEF0000107300437 | Facility identifiers: ICIS indicates that the address is Tin Mill Road and does not include the street number. However, the permit and documents in the file indicate that the address to be 830 Tin Mill Road. |
| 14 | C & B PIPING, INC.(LEEDS) | ALJEF0000107300455 | T5 ACC: ICIS indicates that a T5 ACC was received on 5/5/2021 but a review date is not listed in ICIS. The file contained a copy of a T5 ACC received by Jefferson County on 4/14/2021. The Jefferson County tracking document indicates that the T5 ACC was received by Jefferson County on 4/14/2021 and reviewed on 5/5/2021. The T5 ACC received date was not entered into ICIS. |
| 15 | BAMA CONCRETE BIRMINGHAM | ALJEF0000107300465 | FCE: ICIS indicated that two FCEs were completed on 10/27/2020 and 10/27/2020. The file contained a copy of an inspection report dated 10/27/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/27/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. Facility: ICIS indicates that this facility is still operating but the inspection report indicates that the facility has permanently shutdown. A representative for Jefferson County, indicated that the operating status will be changed to shutdown. |

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SRF Round 3: CAA Facility-Specific Comments

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| 16 | MERIDIAN BRICK, LLC BESSEMER PLANT NO. 6 | ALJEF0000107300486 | The inspection report does not have section pertaining to previous enforcement actions. |
| 17 | MELSUR CORPORATION | ALJEF0000107300494 | The inspection report does not have section pertaining to previous enforcement actions |
| 18 | READY MIX USA TARRANT FACILITY | ALJEF0000107300552 | FCE: ICIS indicates that two FCEs were completed on 10/21/2020. The file contained a copy of an inspection report dated 10/23/2020 for an onsite inspection that was conducted on 10/20/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/21/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. The inspection report does not have section pertaining to previous enforcement actions. |

SRF Round 3: CAA Facility-Specific Comments

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| <p>T5 ACC: ICIS indicates that the T5 ACC was received on 5/18/2021, and ICIS does not indicate whether the ACC was reviewed or if the facility reported any deviations. The file contained a copy of the T5 ACC dated 4/27/2021 and received by Jefferson County on 5/3/2021. The Jefferson County tracking document indicates that the T5 ACC was received on 5/3/2021 and reviewed on 5/18/2021. The data in ICIS appears to be incorrect.</p> <p>Air Programs: ICIS indicates that the facility is subject to 40 CFR Part 63 subpart JJJJJ. However, the permit does not indicate that the facility is subject to the MACT JJJJJ. In a telephone conversation with a representative from Jefferson County, the representative stated that the facility is not subject to MACT JJJJJ, and that the citation will be removed.</p> | | | | |
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SRF Round 3: CAA Facility-Specific Comments

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| 19 | BELLSOUTH TELECOMMUNICATIONS, INC.DBA AT&T ALABAM | ALJEF0000107301019 | The inspection report does not have section pertaining to previous enforcement actions, and did not list all applicable requirements. |
| 20 | UNIVERSITY OF ALABAMA AT BIRMINGHAM | ALJEF0000107301044 | The inspection report does not have section pertaining to previous enforcement actions. |

SRF Round 3: CAA Facility-Specific Comments

T5 ACC: ICIS indicates that T5 ACC was received on 6/14/2021 and no review date was listed. The file contained a T5 ACC dated 6/11/2021, and the Jefferson County tracking document indicates that the T5 ACC was received on 6/11/2021. The T5 ACC date in ICIS is incorrect.

Air Programs: ICIS indicates that the facility is only subject to the SIP requirements. The T5 permit and the inspection report indicate that the facility is subject to NSPS subparts Dc, Ec, IIII and JJJJ, and submit to MACT subparts WWWW and CCCCCC. In an email dated 8/26/2022, a representative from Jefferson County stated that the issue is with the automatic update communication between the Jefferson County's database and ICIS. In a telephone call on 8/26/2022, the Jefferson County representative stated that the automatic update issue has been an issue since April 2020, and Jefferson County has worked with the EPA to resolve the issue, but it has not been resolved.

SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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| 21 | BAMA CONCRETE BIRMINGHAM, BESSEMER PLANT | ALJEF0000107301048 | FCE: ICIS indicates that two FCEs were completed on 10/20/2020. The file contained a copy of an inspection report dated 10/20/2020 for an onsite inspection that was conducted on 10/20/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/21/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. The inspection report does not have section pertaining to previous enforcement actions. |
| 22 | JEFFERSON COUNTY LANDFILL NO. 1 | ALJEF0000107301052 | |
| 23 | BLAIR BLOCK LLC | ALJEF0000107301101 | The opening paragraph of the report indicates that the facility is not in compliance but in the body of the report there was no mention of compliance issues. In an email dated 8/29/2022, a representative from Jefferson County state that the it was a typo and that there were no compliance issues identified during the inspection. |

SRF Round 3: CAA Facility-Specific Comments

T5 ACC: ICIS indicates that a T5 ACC was received on 6/15/2022, and a second T5 ACC was received on 6/15/2020. The file contained a copy of the T5 ACC dated 6/6/2021. The Jefferson County tracking document indicates that the T5 ACC was received and reviewed on 6/14/2021. In an email dated 8/29/2022, a representative from Jefferson County indicated that the activity was entered in ICIS twice by mistake.

The inspection report does not have section pertaining to previous enforcement actions.

The inspection report does not have section pertaining to previous enforcement actions.

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SRF Round 3: CAA Facility-Specific Comments

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| 24 | KINDERMORGAN SOUTHEAST TERMINALS LLC (FY 2020) | ALJEF0000107300235 | |
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SRF Round 3: CAA Facility-Specific Comments

Stack tests: ICIS indicates that two stack tests were conducted, one conducted on 5/30/2019 (passed), and second conducted on 5/31/2019 (pending). The file contained a copy of a report for the stack test that was conducted on May 30, 2019, which indicated that the facility was not in compliance with the NSPS XX and MACT BBBBBB standards. The file contained a copy of a report for the stack test that was conducted on May 31, 2019, which indicated that the facility was in compliance with the NSPS XX and MACT BBBBBB standards. The data in ICIS does not match the information in the test reports. ICIS should indicate failed for the 5/30/2019 test, and ICIS should indicate passed for the 5/31/2019 test.

HPV: Jefferson County issued a NOV dated 7/18/2019 for a failed stack that was conducted on 5/30/2019. The NOV alleged the company was not in compliance with NSPS XX. This enforcement action meets criteria 3 of the HPV policy.

FRV: Jefferson County issued a NOV dated 7/18/2019 for a failed stack that was conducted on 5/30/2019. The NOV alleged the company was not in compliance with NSPS XX. This should have been identified as an FRV.

Informal enforcement actions: Jefferson County issued a NOV dated 7/18/2019 for a failed stack that was conducted on 5/30/2019. The NOV is not identified in ICIS.

Air Programs and subparts: ISIC indicates that the facility is not subject to any NSPS or MACT regulations. The inspection report indicates that the facility is subject to NSPS subparts K and XX, and MACT subpart BBBBBB. This information should be in ICIS.

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SRF Round 3: CAA Facility-Specific Comments

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| 25 | BLUESTONE COKE (FY 2020) | ALJEF0000107300355 | |
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SRF Round 3: CAA Facility-Specific Comments

FCE: ICIS indicates that two FCEs were completed one on 9/14/2020 and the other on 9/30/2020. The file contained a copy of an inspection report for the 9/30/2020 FCE. The Jefferson County tracking document indicates that the FCE was conducted on 9/30/2020. In an email dated 8/31/2022, a representative from Jefferson County stated that the 9/30/2020 was the FCE and that on 9/14/2020 that an in-depth monitoring inspection. The 9/14/2020 onsite evaluation should not have been identified as an FCE.

Informal enforcement action: The file contained an NOV dated 7/15/2020 for violating the requirements of MACT subparts L and CCCCC. The NOV was not in ICIS.

Air programs: The 2009 permit indicates that the facility is subject to 40 CFR part 61 subpart FF, but ICIS does not list part 61 subpart FF. In an email dated 9/1/2022, a representative from Jefferson County indicated that the facility is subject to the subpart, and the information was not transferred to the new data system.

SRF Round 3: CAA Facility-Specific Comments

Day zero was identified as 7/16/2020, and Jefferson County and the company are currently negotiating the terms of the settlement. The file did not contain a case development and resolution timeline. In an email dated 8/31/2022, a representative from Jefferson County indicated that case development and resolution timeline was not prepared but the program did discuss the case during the routine enforcement calls with the EPA.

The file did not contain a case development and resolution timeline. In an email dated 8/31/2022, a representative from Jefferson County indicated that case development and resolution timeline was not prepared but the program did discuss the case during the routine enforcement calls with the EPA.

SRF Round 3: CAA Facility-Specific Comments

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| 26 | UNIVERSITY OF ALABAMA AT BIRMINGHAM (FY 2019) | ALJEF0000107301044 | Air Programs: ICIS did not list all applicable regulations. This was identified with file #20 UAB (FY2021), so this was not identified as a deficiency under this file. |
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SRF Round 3: CAA Facility-Specific Comments

FCE: ICIS indicates that two FCEs were completed during the review year, one on 7/29/2019, and the other on 7/30/2019. The file contained a copy of an inspection report for the onsite inspection that was conducted on 7/29/2019 through 7/31/2019. The Jefferson County tracking document indicates that the inspection was conducted on 7/31/2019. In an email dated 8/31/2022, a representative from Jefferson County stated that there were two different dates (7/29/2019 and 7/30/2019) because the inspection occurred over two days. The inspection report and the Jefferson County tracking document indicate conflicting information than what has been entered into ICIS.

FRV: ICIS indicates that no FRV was identified during the review year. An NOV was issued to the company on 10/23/2018 for late submittal of T5 ACC. This violation should have been identified as an FRV.

Informal enforcement action: ICIS indicates that no NOV was issued, but the file contained a copy of an NOV dated 10/23/2018. The NOV was issued for late submittal of a T5 ACC.

Formal enforcement actions: ICIS indicates that an Administrative Order was issued on 12/5/2018. The file contained a copy of a release agreement dated 11/30/2018. The release agreement assessed a civil penalty in the amount of \$500.

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SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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Instructions: Use as needed to organize facility-specific notes from the file review checklists.

SRF Round 3: CAA Facility-Specific Comments

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SRF Round 3: CAA Facility-Specific Comments

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